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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

Kursten Owen, individually and
d/b/a Elegance & Geekery LLC
(List the full name(s) of the plaintiff(s)/petitioner(s))

Case No.: 6:25 -CV- 01272 - AA

v.

**MOTION FOR APPOINTMENT OF
PRO BONO COUNSEL**

BREANA ASKEW, individually and dba Breromi;
KIANDRA DEMONE BOYCE; DOES 1-100
(List the full name(s) of the defendant(s)/respondent(s))

I, Kursten Owen, ask the Court to request a pro bono attorney to represent me in this action.

I need an attorney in this case because (briefly explain why you need an attorney in this case):
Actions were taken upon both my business entity and me personally, as pro se I cannot legally represent
Elegance & Geekery LLC. I need a legal representative to assist in the remainder of this litigation.

I have reached out to over 100 attorneys and the majority state they cannot assist because the case is too
complex for their standard scope of work. It is so legally complicated, so much so that an article has even
been written about it online by a law professor, so I feel I really need help here (reason.com Owen v Askew).

To support this motion, I declare under penalty of perjury that the following information is true and correct:

1. When I filed this case (check the appropriate box):

☐ I filed an IFP application in this case and it is still an accurate representation of my current financial status.

☒ I paid the filing fee for this case and did not file an IFP application.
This was donated to me and paid out of urgency.

☐ I did not pay the filing fee for this case and I did not file an IFP application
(explain below):

2. I am requesting an attorney to represent me as a(n):
☒ Individual ☒ Company (LLC, LLP, etc.)
3. I am currently incarcerated: ☐ Yes ☒ No **If yes**, where are you currently incarcerated:

4. I contacted a lawyer, law firm, or legal clinic to try to obtain legal representation.
☒ Yes ☐ No **If yes**, list the lawyers, law firms, or clinics you contacted and their responses to your requests:
 List is too long for this section, attached at end.

5. I am currently employed (self or other): ☒ Yes ☐ No
If yes, complete the following:
 Employer name: Elegance & Geekery LLC Take home pay: \$ 851.99
 Employer address: 60995 STONEY POINT RD Per: ☐ Hour ☐ Week ☒ Month
VERNONIA, OR, 97064 Time on job: 10 ☐ Months ☒ Years
6. My significant-other is currently employed (self or other): ☐ Yes ☐ No ☒ N/A
If yes, complete the following:
 Employer name: _____ Take home pay: \$ _____
 Employer address: _____ Per: ☐ Hour ☐ Week ☐ Month
 _____ Time on job: _____ ☐ Months ☐ Years
7. I received money from the following sources in the last 12 months (check all that apply):
☒ Business (professions, self-employment) in the amount of: \$ 33,660
☐ Rental properties, interest, or dividends in the amount of: \$ _____
☐ Pensions, annuities, or life insurance in the amount of: \$ _____
☐ Disability or workers compensation in the amount of: \$ _____
☐ Unemployment benefits in the amount of: \$ _____
☒ Other (describe): Loan- emergency repairs in the amount of: \$ 33,150
and furloughed from 9-5
☐ None of the above.
8. I own the following assets (check all that apply):
☐ Stocks (describe): _____ in the amount of: \$ _____
☐ Real estate (describe): _____ in the amount of: \$ _____
☐ Bonds (describe): _____ in the amount of: \$ _____
☐ Securities (describe): _____ in the amount of: \$ _____

- ☒ Automobiles (describe): Two cars valued at: \$ 20,000
- ☐ Other (describe): _____ in the amount of: \$ _____
- _____ in the amount of: \$ _____
- _____ in the amount of: \$ _____
- ☐ None of the above.

9. I have money in the following accounts (check all that apply):

- ☒ Checking, total current balance of: \$ 3,363
- ☒ Savings, total current balance of: \$ 1,050
- ☐ Certificate of Deposit (CD), total current balance of: \$ _____
- ☐ Money Market, total current balance of: \$ _____
- ☐ Credit union, total current balance of: \$ _____
- ☐ Prison trust account, total current balance of: \$ _____
- ☐ Other accounts (list all other accounts):
- ☐ _____ in the amount of: \$ _____
- ☐ _____ in the amount of: \$ _____
- ☐ None of the above.

10. I am financially responsible for the following monthly expenses (check all that apply):

- ☒ Rent/mortgage payments in the amount of: \$ 2,633.13
- ☒ Utilities in the amount of: \$ 647
- ☐ Child/spousal support in the amount of: \$ _____
- ☒ Credit card/loan payments in the amount of: \$ 255
- ☒ Insurance (home, medical, auto) in the amount of: \$ 200
- ☐ Transportation/auto payments in the amount of: \$ _____
- ☒ Other (list all other monthly expenses):
- ☒ Food/groceries in the amount of: \$ 400
- ☐ _____ in the amount of: \$ _____
- ☐ None of the above.

11. I am financially responsible for the following dependents (if under age 18, use initials):

- Name or initials: _____ Amount of monthly support: \$ _____
- Relationship to you: _____ Age: _____
- Name or initials: _____ Amount of monthly support: \$ _____
- Relationship to you: _____ Age: _____
- Name or initials: _____ Amount of monthly support: \$ _____
- Relationship to you: _____ Age: _____
- ☒ I am not financially responsible for any dependents.

DECLARATION

1. I declare under the penalty of perjury that my answers to the foregoing questions are true and correct.
2. I understand that if I am assigned an attorney and my attorney learns, either from me or elsewhere, that I can afford an attorney, my attorney may give that information to the Court.
3. I understand that even if the Court grants this application, I will receive pro bono counsel only if an attorney volunteers to take my case, and that there is no guarantee that an attorney will volunteer to represent me.
4. I understand that if my answers on this application or in my IFP application are false, my case may be dismissed.

Signature of Applicant: Kursten Owen Date: 8/5/2025

Printed Name of Applicant: Kursten Owen

Current Legal Firms and Representatives Denial

I have reached out to over 100 legal representatives, including all of those provided by the Oregon state bar referral service (only allowed 3 per case). The following list is of the representatives that have returned contact stating they cannot take my type of case, or do not have the available workload to take my case. Most have denied due to the complexity of my case which makes finding an attorney to represent me that much more difficult.

Keegan F Rank (OSB Referral #1)
Benjamin Taylor Ybarra (OSB Referral #2)
Jacob Derman (OSB Referral #3)
Steven Law Firm
Markowitz Herbold PC
Chenoweth Law Group
Michael Fuller
Rothenberg Law Firm
Andersen & Linthorst
DeShaw Law
Dwyer Williams Cherkoss Attorneys, PC
Schoenfeld & Schoenfeld, P.C.
Rizk Law
Goldberg & Loren
Johnston Law Firm, P.C.
Dawson Law Group
Clark Law & Associates, LLC
Tillmann Law Personal Injury Lawyers
Charley Gee P.C.
The Advocates
Law Office of Randall J. Wolfe
Gilroy Napoli Short Law Group LLP
Philbrook Law Office
Robbins Law Oregon LLC
Graves & Swanson LLC
OlsenDaines, P.C.
Shlesinger & deVilleneuve Attorneys, P.C.
Evashevski Elliott PC
Di Bartolomeo Law Office
Heather L. Holt Attorney at Law
Law Offices of Jon Friedman
Law Office of Mike Arnold
Law Office of Gary G. Norris

Paulson Coletti Trial Attorneys PC
Miller & Wagner LLP
Jacobs Wilson Callahan, P.C.
Angel Law, P.C.
Johnson Law, P.C.
Steven J. Sherlag, P.C.
Usera & Snow, P. C.
Johnson Johnson Lucas & Middleton
Law Office of Keri Trask Lazarus
The Gatti Law Firm
Harrang Long P.C.
Bell Law Offices, PC
Law Offices of Robert D. Lowry (Kell, Alterman & Runstein, L.L.P.)
Garrett Hemann Robertson, PC
Spooner Staggs Trial Lawyers
Peton Law LLC
Littler Mendelson, P.C.
Jensen Elmore Stupasky & Lessley, P.C.
Jarvis Bridge Halttunen & Weyer, LLC
Sarah Harlow (Francis Hansen & Martin)
Internet Law Group
Fogarty Law Group
Tim Jones PC
Grant Engrav